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May 20, 1998

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VIA HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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MAY 20 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Notification of Permitted Ex Parte
Presentation in MM Docket No. 95-176

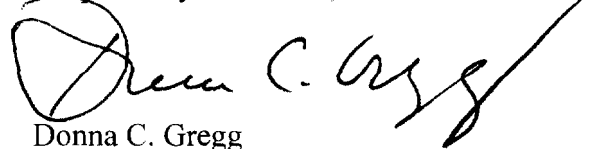
Dear Ms. Salas:

CBS Corporation ("CBS"), by its attorneys and pursuant to Section 1.1206(a)(1) of the Commission's rules, hereby submits an original and one copy of a notification of an ex parte contact regarding MM Docket No. 95-176.

Gail G. MacKinnon, Vice President of Federal Relations for CBS, along with Donna C. Gregg of Wiley, Rein & Fielding, counsel for CBS, met with Rick Chessen, Senior Legal Advisor to Commissioner Gloria Tristani. The purpose of the meeting was to discuss issues regarding closed captioning as set forth in the attached materials.

Kindly direct any questions regarding this matter to the undersigned counsel.

Respectfully submitted,



Donna C. Gregg
Counsel for CBS Corporation

Enclosures

cc: Rick Chessen (w/o enclosures)

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GAIL G. MACKINNON
VICE PRESIDENT, FEDERAL RELATIONS

CAPTIONING CONCERNS OF SPANISH-LANGUAGE PROGRAMMERS

INTRODUCTION TO TELENOTICIAS

- **Program format and focus:** 24-hour, advertiser supported Spanish-language headline news service that originates news reports and features with a pan-regional and global focus, using reporters and anchors based throughout Latin America, Spain and around the globe.
- **History:** Launched in 1994 as a joint venture of TeleMundo, Reuters and several Spanish language broadcasters to produce newscasts for TeleMundo stations. Acquired by CBS in 1996
- **Distribution:** Primarily international. Over 95% of cable households served are located outside the U.S., principally in Latin America. U.S. distribution comprises less than 5% (around 1 million households).

OBSTACLES TO CAPTIONING

- **Shortage of captioning resources for Spanish language programming in general:** TeleNoticias' experience in investigating Spanish language captioning services is consistent with Univision's. As a general rule, there are insufficient existing and trainable Spanish-speaking captioners to assume sudden responsibility for captioning massive amounts of Spanish-language programming.
- **Obstacles relating to TeleNoticias' international headline news format:** The captioning resources that do exist for Spanish programming are not suited for real-time captioning. The vast majority of TeleNoticias' programming, though pre-recorded, is aired almost immediately (*i.e.*, approximately 4 hours) after production. The need to insert captions would require major changes in our technical operation. Non-news programs produced in advance (typically only a few days before airing) comprises only about 5 hours per month of our program schedule. Program content must be current, so captioned programs have a very brief "shelf life."

FUTURE PLANS AND CONCERNS

- **Expansion in U.S. market:** TeleNoticias hopes to expand its U.S. distribution.
- **Innovation in programming:** Continued innovation and development of more diverse, high quality programming also are important goals.
- **Impact of rapid imposition of closed captioning requirements:** Especially given its format, TeleNoticias will have severe difficulties with near term, wide scale captioning, placing future expansion and other plans in jeopardy.

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